

REMARKS

This Amendment is in response to the Final Office Action dated September 8, 1999, the deadline to which has been extended by three (3) months from December 8, 1999 to March 8, 2000, by petition and payment of fee. Claims 1-29 are pending in the present application. Claims 1-29 are under final rejection. Consequently, claims 1-29 remain pending in the present application. Applicant has amended claims 1, 11, 19, 21, and 22 and presented arguments hereinbelow that Applicants believe should render the claims allowable. However, in the event that the Examiner is not persuaded by Applicants' arguments, Applicants respectfully request that the Examiner enter the amendment to clarify issues upon appeal. A Notice of Appeal is also being filed herewith.

In amending claims 1, 11, 19, 21, and 22, Applicants have included key features of the present invention which are supported in the specification and no new matter has been added. The key features of the present invention include a specific list of parameters, support for which is found in the Table I, page 20 of the specification, a GetCapabilities command, support for which is found on page 27, lines 10-13 of the specification, and a plurality of parameter scripts that are selectively chosen by a user and executed within the device, support for which is found on page 22, lines 8-10 of the specification.

The Examiner has rejected claims 1-18, 21 and 22-29 under 35 U.S.C. 103(a) as being unpatentable over Howes et al. (hereinafter "Howes") in view of Kare et al. (hereinafter "Kare") (U.S. Pat. No. 5,541,656).

All of the claims are directed to a system or method for controlling parameters in a hand held electronic device. Storage locations coupled to the electronic device store value sets corresponding to certain parameters including exposure mode specification, focus mode

specification, strobe mode specification, zoom position specification, shutter speed specification, and focus distance specification. A set of parameter commands controls the stored values sets. In particular, a GetCapabilities command advantageously retrieves information, capabilities and permissible values for the parameters supported in the camera and selected by a user. A user can selectively execute a plurality of parameter scripts to initiate and control parameter commands. Further, a parameter manager coupled to the electronic device executes the parameter commands to control the value sets corresponding to the parameters. The key features of the present invention include a specific list of parameters, the GetCapabilities command, and the plurality of parameter scripts that are chosen by a user and executed within the device.

The Examiner states:

Claims 1-18, 21 and 22-29 are rejected under 35 U.S.C. 103(a) as being unpatentable over Howes et al. in view of Kare et al. (U.S. Pat. No. 5,541,656).

As per claims 1-18, 21, Howes et al. teaches a system and a method for controlling parameters in an electronic device, comprising:

a series of parameter storage locations for containing value sets corresponding to said parameters (col. 17, lines 39-46);

a set of parameter commands for controlling said value sets (col. 18, lines 9-15);

a parameter manager for executing said set of parameter commands (col. 18 lines 16-18 and lines 38-55);

a current parameters location containing value sets corresponding to current parameters (col. 17, lines 39-42);

a user defaults location containing value sets corresponding to user defaults (col. 17, lines 45-46);

a factory defaults location containing value sets corresponding to factory defaults (col. 17, lines 43-44);

said current parameters location is in a random-access memory (col. 20, lines 18-20);

said user defaults location is in an electrically-erasable programmable read-only memory (col. 20, lines 4-7);

said factory defaults location is in a non-volatile memory (col. 19, lines 65-67);

a command to provide one or more of said value sets from said current parameters location to an external command source (col. 20, lines 49-55);

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from said user defaults location to a processor (col. 17, lines 53-59);
 from said current parameters location to a processor (col. 20, lines 11-17);
 from said factory defaults location to an external command source (col. 4, lines 7-14)

a command to set one or more of said value sets in said current parameters location based on information received from an external command source (col. 20, lines 49-55);

in said user defaults location based on information selectively obtained from one of a processor within said electronic device (col. 20, lines 11-17), an external command source (col. 19, lines 61-64), said current parameters of location (col. 20, lines 56-62) and said factory defaults location (col. 17, lines 47-52);

in said current parameters location based on information received from a processor within said electronic device (col. 17, lines 60 - 62);

a command to restore one or more of said value sets in said current parameters location to information selected from said factory defaults location (col. 20, lines 66-col. 21, lines 4);

in said current parameters location to information selected from said user defaults location (col. 20, lines 41-48 and col. 21, lines 5 - 11);

said set of parameter commands are originated by an external command source and said parameter manager responsively accesses parameter information in a resource file to control said parameters (col. 18, line 6-col. 19, line 34); and said parameter manager acts on all of said parameters in one of said series of parameter locations if a corresponding one of said set of parameter commands does not specify a particular one of said parameters (col. 18, lines 31-37 and col. 21, lines 52-54).

The Examiner also stated,

Howes et al. does not teach specifically a hand held device.

Kare et. al., however, teaches a system for controlling parameters in a hand-held digital camera (col. 2, lines 9-23 and lines 36-41).

It would have been obvious to one of ordinary skill in the art to combine the teachings of Howes et al. and Kare et al. because they both direct to controlling parameters in an electronic device and Kare et al.'s teaching of a hand-held digital camera would make the device portable and capable of receiving images electronically as digital data on its on-board memory.

As per claims 22-29, see the 103 rejections to claims 1-18 and 21 above for Kare et al.'s teaching of a hand-held digital camera.

Howes teaches a terminal configuration manager which stores configuration data in memory as processing routines, and utilizes specially labeled function keys (e.g. F1- Display parameter, F2- Keyboard parameter, F3- Printer parameter) of a computer keyboard. Modified short-term configuration data may be transferred to non-volatile read/write memory where it

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becomes long-term configuration data. Such long-term configuration data is transferred back to the configuration registers upon subsequent application of power to the terminal.

Kare teaches a digital camera with separate function and option icons and control switches. The hand held digital camera records images electronically as digital data in the on board memory. The camera has a user interface with a LCD having a plurality of selectable function icons representing a plurality of selectable functions and selectable options. To retrieve and use the pictures, the camera is connected to a host computer via an appropriate communication interface and software within the host computer. Software within the host computer accesses the data stored for displaying the captured image on a display, merging image into a document, storing or printing on a suitable printer. In one embodiment, the hand held digital camera is responsive to a command from the external digital computer which has default settings for selectable functions such as exposure offset, shutter delay, or flash functions.

Applicants respectfully submit that neither Howes nor Kare, either singularly or in combination, teach or suggest any of the key features of the present invention. One key feature of the present invention is a specific list of parameters including an xmod- exposure mode specification, fmod- focus mode specification, smod-strobe mode specification, zpos- zoom position specification, shut- shutter speed specification, and fdst- focus distance specification. (Support found in the specification, Table I. page 20). Another key feature of the present invention is the GetCapabilities command which advantageously retrieves information, capabilities and permissible values for selected parameters that are supported in the camera (Support found in the specification, page 27, lines 10-13). The third key feature of the present invention is a plurality of parameter scripts that a system user can selectively execute to initiate and control parameter commands (Support found in the specification, page 22, lines 8-10). Accordingly,

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Applicants respectfully submit that claims 1-18, 22-29 are allowable over the cited references.

With respect to claims 19 and 20 the Examiner states:

Claims 19 and 20 are rejected under 35 USC 103(a) as being unpatentable over Howes, et al. in view of Kare et al. and further in view of Filion et al.

Howes et al. and Kare et al. teach all of the features of the invention except a computer-readable medium comprising of program instructions for controlling parameters in an electronic device; wherein said medium is a memory device which is removable for reprogramming, and which contains scripts that execute said set of parameter commands to cause said parameter manager to control said value sets corresponding to said parameters.

Filion et al., however, teaches such a computer-readable medium for controlling parameters in an electronic device (col. 20, lines 1-8).

It would have been obvious to one of ordinary skill in the art to combine the teachings of Howes et al. and Kare et al. with those of Filion et al. because they all direct to controlling parameters in an electronic device and Filion et al.'s afore mentioned teaching would result in a more flexible system."

Applicants respectfully submit that Filion teaches a remote programming technique using a display screen. In Filion, a technique for pre-programming a reproduction machine (copier) for a plurality of complex jobs is disclosed. Selected features for print jobs are stored on a floppy disk which can be inserted into a copier to automatically pre-program the machine to run a number of discrete jobs.

Claim 19 is a computer-readable medium comprising program instructions for controlling parameters in a hand held electronic device which is similar in scope as claim 11. Further, the arguments applied herein for claim 11 apply with equal force to this rejection. Applicants contend that it would not have been obvious to one of ordinary skill in the art to combine the teachings of Howes, Kare, and Filion. As Filion is non-analogous art, it is highly unlikely that a person of ordinary skill in the art would pursue modification of a hand-held digital camera by seeking out technology related to a reproduction machine or copier. Accordingly, Applicants respectfully submit that claim 19 is allowable over the cited references.

Claim 20 depends upon independent claim 19. Consequently the arguments herein apply

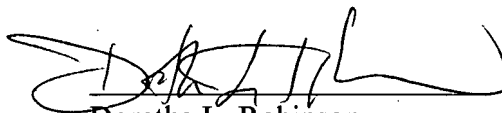
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with equal force to claim 20. Accordingly, Applicants respectfully submit that claim 20 is allowable over the cited references.

In view of the foregoing, it is submitted that the claims in the application are patentable over the cited references and are in condition for allowance. Applicant respectfully requests reconsideration, allowance, and passage to issue of claims 1-29 as now presented.

Applicant's attorney believes that this application is in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,



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